

EXHIBIT 66-B
Redacted Version of
Document Sought to be Sealed

Mike Clark Deposition Notes

Background

I spent 35 hours with counsel preparing and 20 hours on my own.

I reviewed approximately 45 documents (e.g. the UDDP, the relevant deletion controls from 2012 to present, PWC's audits from 2013-2019, Wikis describing the technical details of deletion), and the 25 documents provided by Plaintiffs.

I spoke with;

- Scott Renfro
- Yiannis Papagiannis
- Mayur Patel
- Eugene Zarashaw
- Ryan Borker
- Will Shackleton
- Hannes Roth

Notes

Timeline of Data Deletion and De-Identification From 2007-2020

2007

- 1) Users have the option to delete specific content, such as posts and photos, but deletes are soft deletes.
- 2) Users can deactivate their accounts on their My Privacy page.
- 3) Employees can trigger account deletion if formally requested by the user.
- 4) REDACTED - SOURCE CODE
- 5) **Privacy Policy states:**
 - a) *Facebook users may modify or delete any of their profile information at any time by logging into their account. Information will be updated immediately.*
 - b) *Removed information may persist in backup copies for a reasonable period of time but will not be generally available to members of Facebook.*

**Exhibit
0339**

5/18/2022
30(b)(6) Clark

2008

- 1) Self-serve deletion button is introduced, allowing users to delete their accounts.
 - a) Largely disables user accounts.
 - b) Hard deletion focuses on removing PII (e.g. profile information, such as names, email addresses, and contact information).

2009

- 1) **Privacy Policy is updated:**
 - a) *If you want to stop using your account you may deactivate it or delete it.*
 - b) *When you delete an account, it is permanently deleted. You should only delete your account if you are certain you never want to reactivate it.*
 - c) *[Facebook] may retain certain information to prevent identity theft and other misconduct even if deletion has been requested.*
 - d) *Removed and deleted information may persist in backup copies for up to 90 days, but will not be available to others.*

2010

- 1) Users can hard delete photos, posts, aliases.
 - a) Deletion requests result in immediate REDACTED - SOURCE CODE which are later removed though REDACTED - SOURCE CODE Media brings attention to CDN issue (links to deleted photos continue to work).
- 2) Account deletion removes user PII (largely contact information) and prevents access to other user content.
- 3) Individual product teams continue to write REDACTED - SOURCE CODE
- 4) Sec Eng team is formed to build more comprehensive deletion framework. Later becomes known as Security Infra.

2011

- 1) Centralized deletion framework is developed and implemented around Sept. 2011. Formalizes deletion process to facilitate completion of jobs.
 - a) REDACTED - SOURCE CODE to remove photos within 90 days of deletion.
 - b) Account deletion code is modified to remove additional content (e.g. REDACTED - SOURCE CODE).

- c) REDACTED - SOURCE CODE
- d) There is a concerted effort by AccData storage teams to write deleters for anything that did not already have a delete. REDACTED - SOURCE CODE
- 2) REDACTED - SOURCE CODE to de-identify and/or pseudonymize REDACTED - SOURCE CODE
 - a) REDACTED - SOURCE CODE automatically deleted within 90 days.
 - b) REDACTED - SOURCE CODE are deleted on day 90.
 - c) When an account is deleted, the REDACTED - SOURCE CODE
- 3) CDN issue is resolved by making REDACTED - SOURCE CODE
- 4) FB enters consent decree with the FTC.
- 5) **Privacy Policy is updated:** *When you delete an account, it is permanently deleted from Facebook. It typically takes about one month to delete an account, but some information may remain in backup copies and logs for up to 90 days. You should only delete your account if you are sure you never want to reactivate it.*

2012

- 1) Deleters become more robust. There is a concerted effort to find all data pertaining to an account or object and to delete all related system data.
- 2) REDACTED - SOURCE CODE is developed to monitor and address REDACTED - SOURCE CODE
- 3) Historic deletions are re-deleted to ensure deletion of all data.
- 4) Implements 14-day “cool off” period between deletion request and initiation of deletion job (later extended to 30-days). About 40% of users who delete their account, later change their mind.
- 5) **Privacy Controls under FTC Consent Decree are written.**
 - 5.2.2 A – Implementation of a Data Deletion and Retention framework
 - 5.2.2 B – Assures (1) historical deletions, (2) when a user deletes their account, all user data associated with the account is deleted, and (3) when a user deletes content, the content is deleted from any permanent data stores.
 - 5.2.2 C – Deactivation requests lead only to a hold. Deletion requests lead to actual deletion and/or anonymization within 90 days.
 - 5.2.3 A – Data in UDB is deleted within 90 days through automated data deletion. REDACTED - SOURCE CODE
 - 5.2.3 B – REDACTED - SOURCE CODEs used to monitor and resolve REDACTED - SOURCE CODE

5.2.3 C – New associations are identified via the REDACTED - SOURCE CODE REDACTED - SOURCE CODE and are added to the data deletion framework.

5.2.3 D - Once the number or type REDACTED - SOURCE CODE added to the Data Deletion Framework REDACTED - SOURCE CODE against all previously deleted accounts.

- 6) **Privacy Policy is updated:** *Some of the things you do on Facebook aren't stored in your account, like posting to a group or sending someone a message (where your friend may still have a message you sent, even after you delete your account). That information remains after you delete your account.*

2013

- 1) PwC tests privacy controls. Finds no issues relating to deletion.
- 2) Deletion framework continually improved and updated to cover new types of data.
- 3) REDACTED - SOURCE CODE are introduced for REDACTED - SOURCE CODE

2014

- 1) REDACTED - SOURCE CODE is incorporated.
 - a) REDACTED - SOURCE CODE derived from markings in REDACTED - SOURCE CODE
 - b) Developers REDACTED - SOURCE CODE when they create data types.
 - c) Simplified product team input for deleters, REDACTED - SOURCE CODE
- 2) **Privacy Controls** are streamlined but substantively the same.

2015

- 1) Privacy Controls receive minor amendments:
 - a) Data Deletion and Retention script is REDACTED - SOURCE CODE
 - b) Acknowledges content shared by others about a user will not be removed when a user deletes their account.
- 2) PwC audits 2013-2015 privacy controls. Finds no issues relating to deletion on FB.

2016

- 1) Privacy Controls receive minor amendment, noting deletion jobs REDACTED - SOURCE CODE

2017

- 1) PwC audits 2015-2017 privacy controls. Finds no issues relating to deletion on FB.

2018

- 1) "Cool off" period between deletion request and initiation of deletion job is extended to 30 days.

2019

- 1) REDACTED - SC **framework is incorporated.**
- 2) PwC audits 2017-2019 privacy controls. Finds no issues relating to deletion on FB.
 - a) REDACTED - SOURCE CODE
 - b) REDACTED - SOURCE CODE

2020

- 1) FB enters second FTC Consent Decree. Protiviti replaces PwC as auditor.
 - a) *Respondent and its Representatives shall further implement procedures designed to ensure that Covered Information entered by the User (such as User-generated content) is deleted from servers under Respondent's control, or is de-identified such that it is no longer associated with the User's account or device, within a reasonable period of time (not to exceed 120 days).*
- 2) Implements formal User Data Deletion Policy in October 2020.
- 3) Embarks on effort to inventory data stores and verify ongoing compliance.
- 4) **DLCM Controls Include .**
 - a) Retention: FB maintains policies that limit retention of data to no longer than necessary to serve the purposes for which the data was collected.
 - b) Deletion Exceptions: FB maintains processes to ensure that when a user deletes their account/data it is deleted or deidentified except: (i) as required by law; (ii) where necessary for safety and security, including to prevent fraud or malicious activity, (iii) where stored solely for backup or disaster recovery, or (iv) where copies of the data are posted by other users.
 - c) Third Party Access: FB maintains processes to ensure third parties cannot access deleted data within 30 days of deletion (subject to the same exceptions)

- d) FB-Owned Affiliates: FB maintains processes for reviewing and addressing privacy risks of sharing user data between FB and other FB-owned affiliates.